

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL DIFILIPPI,

Defendant.

FILED BY *[Signature]*
01 MAR 21 AM 10:05
CLARENCE MADDOX
CLERK U.S. DIST. CT.
S.D. OF FL.-MIAMI
D.C.

UNOPPOSED MOTION TO PERMIT ALL BUSINESS RELATED TRAVEL

COMES NOW the Defendant, **PAUL DIFILIPPI**, by and through his undersigned counsel, and respectfully moves this Honorable Court to enter an order permitting Mr. DiFilippi to travel outside of the Southern District of Florida for job related purposes without further order of Court. In furtherance of this motion, Mr. DiFilippi would respectfully set forth the following:

1. Mr. DiFilippi was arrested and charged in the above-styled cause in one count of the Indictment. He is currently on bond, and has abided by all terms and conditions of his release.

2. Mr. DiFilippi is employed by American Classic Voyages. He is an employee services manager, and has been employed with this company since October 18, 2000. In furtherance of his job requirements, it is necessary that he travel on an occasional basis to work sites within the company's corporate chain. The company has requested that Mr.

388
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DiFilippi be permitted to travel outside the Southern District of Florida for work related purposes on a continuous basis. See Attachment One. For example, it is the company's request that Mr. DiFilippi travel to Virginia and Michigan, on separate itineraries, in the next month.

3. It is respectfully requested that this Honorable Court enter an order granting Mr. DiFilippi the opportunity to continue with his employment and allow him to fulfill his duties within that employment.

4. Because Mr. DiFilippi's request to travel entails several itineraries over the next month, he is requesting that this Court grant him permission to travel on all work-related activities without seeking individual approval. Rather, he has requested that this Court grant permission to Mr. DiFilippi to travel, upon his written demonstration to Pre-trial Services with copies furnished to the Government, of all business-related itineraries involving his travel.

5. Undersigned counsel certifies that he has contacted Assistant United States Attorney Diana Fernandez regarding this request, and the Government has indicated that it does not oppose the granting of this motion. The Government's sole request is that Mr. DiFilippi be required to furnish, in writing, to Pre-trial Services Officer Carol Siroto his business itinerary before leaving on a business trip, and that he contact Ms. Siroto upon his return.

6. Undersigned counsel would certify that he has also attempted to contact Pre-trial Service Officer Carol Siroto, but did not receive a response prior to filing this motion.

WHEREFORE, it is respectfully requested that this Honorable Court enter an order granting Mr. DiFilippi the ability to travel for work related purposes as requested in this

motion, with the proviso that all other terms and conditions of his release shall remain in effect.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was mailed this 19 day of March, 2001 to: **MR. BRIAN McCORMICK**, Assistant U.S. Attorney, Office of the U.S. Attorney, 500 East Broward Blvd., Suite 700, Ft. Lauderdale, Florida 33394; and **MS. CAROL SIROTTA**, U.S. Pre-trial Services, 299 East Broward Blvd., Room 301, Ft. Lauderdale, Florida 33301.

Respectfully submitted,

PETER RABEN, P.A.
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By: 

PETER RABEN, ESQUIRE
Florida Bar No. 231045

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March 19, 2001

To whom it may concern:

This letter is to request the court to approve for Paul DiFilippi to be able to travel from time to time. Paul is an important part of our team and it would benefit our company for him to travel.

If you should require any further information, please contact me at (305) 774-7566.

Thank you.

Lou Vaccaro
Director of Human Resources
American Classic Voyages

cc: Peter Raben, Esq.

Attachment 1